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INTERNATIONAL, INC., A DIVISION OF URS
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES
CONSOLIDATED LITIGATION**

PERTAINS TO: MRGO

**(PENDING IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF LOUISIANA AS CIVIL
ACTION NO. 05-4182 "K" (2) BEFORE
HON. STANWOOD R. DUVAL, JR.),**

Defendant.

**Case No. MISC. NO. 08-CV-
80007MISC (PJH)**

**STIPULATION AND [PROPOSED]
ORDER CONSOLIDATING AND
MOVING HEARINGS ON
DISCOVERY MOTIONS**

Date: March 5, 2008
Time: 10:00 a.m.
Courtroom: G, 15th Floor
Judge: Hon. Bernard Zimmerman

WHEREAS, the Court has currently scheduled a hearing on the pending Discovery
Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and
Contemporaneous Motion to Stay Production; and the February 5, 2008 WGII Cross-Motion to
Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO
litigation) for March 5, 2008 at 10:00 a.m;

WHEREAS, an additional, related discovery motion was filed on February 14, 2008 (MR-
GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay
Production) that will not be fully briefed by the March 5, 2008 hearing date;

WHEREAS, an additional, related discovery motion was filed on February 28, 2008

(WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation) and was noticed for hearing on April 16, 2008 at 10:00 a.m.;

WHEREAS, all these motions are related and the interests of efficiency and judicial economy warrant their consolidation into a single hearing;

WHEREAS, the Court has indicated April 16, 2008 is available for civil law and motion hearings;

IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the hearings on the various discovery motions detailed above are consolidated and scheduled for hearing on April 16, 2008 at 10:00 a.m.

Dated: February 29, 2008

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Dated: February 29, 2008

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1 Dated: February 29, 2008

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[PROPOSED] ORDER

The Court, having considered the above stipulation of the parties, and good cause appearing, hereby ORDERS:

1. The hearings on the following discovery motions:

A) the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production;

B) the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation;

C) the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production; and

D) the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation;

are hereby scheduled for a consolidated hearing on April 16, 2008 at 10:00 a.m. The previously scheduled March 5, 2008 hearing is hereby vacated.

IT IS SO ORDERED.

Dated: _____

HON. BERNARD ZIMMERMAN
United States Magistrate Judge